

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

(1) PAUL A. ROSS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 14-cv-783-JHP-PJC
	)	
(1) SHAWN RASH,	)	
	)	
Defendant.	)	

**UNOPPOSED MOTION FOR EXTENSION OF SCHEDULING ORDER**

Defendant Shawn Rash moves the Court for a 90-day extension of the remaining dates in the current Scheduling Order (Dkt. 13). In support of this Motion, Rash states as follows:

1. The current Scheduling Order provides for the following remaining deadlines:

9/16/2015	Exchange and file Final Witness and Exhibit Lists.
10/16/2015	Discovery Cutoff.
08/10/2015	All Dispositive Motions.
11/03/2015	Motions in Limine and <i>Daubert</i> issues filed.
11/06/2015	Written Settlement Report.
11/06/2015	Parties to file Deposition/Videotape Designations.
11/13/2015	Parties to file Counter-Designations.
11/13/2015	Agreed Pretrial Order due.
11/13/2015	Agreed Jury Instructions.
11/20/2015	Parties to file Objections to Designations and Counter-Designations.
11/20/2015	Pretrial Conference at 9:30 a.m.
12/15/2015	Jury Trial.

2. No previous motions for extension of time have been filed.

3. Rash seeks an extension of the Scheduling Order for two reasons. First, the parties have engaged in informal settlement discussions over the last several weeks and wish to allow sufficient time for discovery if such discussions are not fruitful. Second, the parties wish to allow sufficient time for discovery given the addition of another defendant, Troy Moran. This extension is sought in good faith and not for purposes of delay, but to facilitate the orderly and efficient adjudication of this case.

4. Rash is authorized to state that Plaintiff has no objection to the filing of this Motion or the requested extension.

5. The requested extension will affect all remaining dates in the Scheduling Order, as well as the trial setting, by ninety days.

A proposed order is submitted with this Motion.

Respectfully submitted,

s/Barbara M. Moschovidis

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### **CERTIFICATE OF SERVICE**

I hereby certify that on July 29, 2015, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic

Filing to the following ECF registrants:

Thomas L. Vogt  
Patrick G. Colvin

s/Barbara M. Moschovidis  
Barbara M. Moschovidis